

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT  
DISTRICT OF MASS.

CHARLENE WOOD,

Plaintiff,

v.

THE CHARLES STARK DRAPER  
LABORATORY, INC.,

Defendant.

Civil Action No. 04-12183 (PBS)

**DEFENDANT'S INITIAL DISCLOSURES**

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendant the Charles Stark Draper Laboratory, Inc. ("Draper") hereby makes the following initial discovery disclosures.

**A. Identification of Individuals Likely to Have Discoverable Information**

Draper identifies the following individuals likely to have discoverable information that Draper may use to support its defenses, and the subject(s) of such information.

1. Linda Knight  
Senior Human Resources Representative  
555 Technology Square  
Cambridge, MA 02139-3563

Ms. Knight has general knowledge of Draper's personnel policies.

2. Risa Ferri  
Benefits Administrator  
555 Technology Square  
Cambridge, MA 02139-3563

Ms. Ferri has general knowledge of Draper's benefit plans and programs and has knowledge of her conversations with Ms. Wood regarding her return to work.

3. Lawrence Bella  
Supervisor, Document Control and Mailroom  
555 Technology Square  
Cambridge, MA 02139-3563

Mr. Bella has knowledge of Draper's mail room and document control room procedures. He also has knowledge of Ms. Wood's job performance and the accommodations Draper provided to Ms. Wood.

4. Jack O'Neill  
Director of Security  
555 Technology Square  
Cambridge, MA 02139-3563

Mr. O'Neill has knowledge of Draper's mailroom and document control policies and procedures. He also has general knowledge of Ms. Wood's job performance, the accommodations Draper provided to Ms. Wood and the general workload of the mailroom and document control room. Mr. O'Neill also has knowledge of the reasons Ms. Wood was selected for layoff.

5. Jack Barry  
Director of Administration  
555 Technology Square  
Cambridge, MA 02139-3563

Mr. Barry has knowledge of the reasons for the layoff and the reasons Ms. Wood was selected for layoff.

6. Jeanne Benoit  
Principal Director of Human Resources  
555 Technology Square  
Cambridge, MA 02139-3563

Ms. Benoit has general knowledge of the decision to layoff an individual in the document control and mailroom area. Ms. Benoit also has knowledge of Draper's policies and procedures.

7. Marisa Pester  
555 Technology Square  
Cambridge, MA 02139-3563

Ms. Pester has knowledge of the workload in the mail and document control rooms, her own work experience, Ms. Wood's absences and the classes she took to improve her skill set.

8. Brian Brooks  
555 Technology Square  
Cambridge, MA 02139-3563

Mr. Brooks has knowledge of the workload in the mail and document control rooms, his own work experience, Ms. Wood's absences and the classes he took to improve his skill set.

9. Paul Butkiewicz  
555 Technology Square  
Cambridge, MA 02139-3563

Mr. Butkiewicz has knowledge of the workload in the mail and document control rooms, his own work experience, Ms. Wood's absences and the classes he took to improve his skill set.

**B. Document Disclosure**

The following is a description, by category, of non-privileged documents, data compilations and tangible things in Draper's possession, custody or control which, at this time, Draper may use to support its defenses. Subject to the Stipulated Protective Order Regarding Confidential Information, these documents will be produced in response to Plaintiff's First Request For Production of Documents at the offices of Paul F. Wood, 45 Bowdoin St., Boston, MA 02114.

1. Documents contained in the plaintiff's personnel file, including documents concerning plaintiff's job responsibilities and job performance.
2. Documents contained in the plaintiff's medical file.
3. Draper Laboratory Human Resources Policies and Procedures Manual; Employee Policy Guide August 2002; The Charles Stark Draper Laboratory Technology Licensing Royalty and Equity Sharing; Equal Employment Opportunity Statement; form letter regarding request for FMLA leave
4. Subject to the Stipulated Protective Order Regarding Confidential Information, the personnel files of Marisa Pester, Brian Brooks, and Paul Butkiewicz
5. Draper's Position Statement to the MCAD and its Answer to the Complaint

**C. Damages**

Draper is not requesting damages.


**D. Insurance Agreements**

Draper will produce a copy of the insurance agreement under which an insurance company may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

Respectfully submitted,

THE CHARLES STARK DRAPER  
LABORATORY, INC.,

By its attorneys,

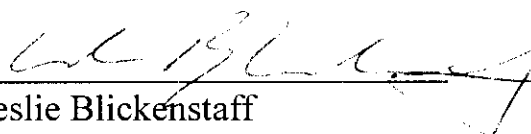
  
James W. Nagle, P.C. (BBO No. 366540)  
Leslie S. Blickenstaff (BBO NO. 636267)  
GOODWIN PROCTER LLP  
Exchange Place  
Boston, Massachusetts 02109-2881  
(617) 570-1000

Date: January 31, 2005

**CERTIFICATE OF SERVICE**

I, Leslie Blickenstaff, hereby certify that on January 31, 2005, a true copy of the foregoing Defendant's Initial Disclosures was served by hand upon:

Paul F. Wood, Esq.(BBO #565195)  
Law Office of Paul F. Wood, P.C.  
45 Bowdoin Street  
Boston, MA 02114  
(617) 532-2666

  
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Leslie Blickenstaff